

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

v.

TERRAFORM LABS, PTE. LTD. and DO  
HYEONG KWON,

Case No. 1:23-cv-01346

**DECLARATION OF DOUGLAS W. HENKIN IN SUPPORT OF DEFENDANTS'  
MOTIONS IN LIMINE**

Douglas W. Henkin declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney duly admitted to practice law before this Court and a partner with the law firm of Dentons U.S. LLP, counsel for Defendant Terraform Labs Pte. Ltd in the above-captioned action. I make this Declaration in support of Defendants' Motions in Limine. This declaration is based on my personal knowledge except as otherwise indicated.

2. Attached hereto are true and correct copies of the following documents:

Exhibit Number	Exhibit Description
A	Pl.'s Pre-Trial Disclosures
B	Kuan Deposition Transcript
C	DiSomma Dep. Ex. 4 [REDACTED]
D	TFL SEC 00219392, [REDACTED] [REDACTED]
E	[REDACTED] Transcript
F	[REDACTED]
G	[REDACTED] Transcript

H	SEC Trial Ex. 123b
I	SEC Trial Ex. 122a-b (122a is the audio file, 122b transcript is included for filing)
J	SEC Trial Ex. 123a-b (123a is the audio file, 123b transcript is included for filing)
K	SEC Trial Ex. 124a (124a is the audio file, 124b transcript is included for filing)
L	SEC Trial Ex.124b
M	SEC Trial Ex.125a (125a is the audio file, 125b transcript is included for filing)
N	SEC Trial Ex.125b
O	SEC-HO-14164-E-0002724
P	Luu Deposition Transcript
Q	TFL_SEC_00202807
R	TFL_SEC_00281339
S	TFL_SEC_00281340
T	Pl.'s Fourth Am. R. 26(a) Initial Disclosures dated October 2, 2023
U	Email dated January 15, 2024 from James P. Connor

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 15, 2023

/s/ Douglas W. Henkin  
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